1 2	Michael T. Hornak (State Bar No. 81936) mhornak@rutan.com Michael D. Adams (State Bar No. 185835) madams@rutan.com RUTAN & TUCKER, LLP 611 Anton Boulevard, Fourteenth Floor Costa Mesa, California 92626-1931 Telephone: 714-641-5100 Facsimile: 714-546-9035		
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6 7	Attorneys for Plaintiff AMERICAN AUTOMOBILE ASSOCIATION, INC.		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	AMERICAN AUTOMOBILE	Case No. CV 07-5720 MHP	
12	ASSOCIATION, INC., a Connecticut corporation,	CTIDUI ATION AND IDDODOCEDI	
13	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE	
14	VS.	MANAGEMENT CONFERENCE	
15	MOHAMMAD NAJAFPIR, an individual doing business as AAA		
16 17	SMOG TEST ONLY; AAA SMOG TEST ONLY, an entity of unknown form; and DOES 1 through 10, Inclusive,	Complaint Filed: November 13, 2007	
18	Defendants.		
19			
20			
21	Plaintiff American Automobile Association, Inc. ("AAA") and defendant		
22	Mohammad Najafpir ("Najafpir") submit this Stipulation and Proposed Order to		
23	Continue Case Management Conference as follows:		
24	WHEREAS the parties have agreed to settle the above-captioned case;		
25	WHEREAS on May 19, 2008, counsel for AAA sent counsel for Najafpir a		
26	proposed written settlement agreement;		
27	WHEREAS counsel for Najafpir has advised counsel for AAA that Najafpir		
28	agrees to all but two provisions of the written settlement agreement;		
		STIPULATION AND PROPOSED ORDER	

Rulan & Tucker LLP attorneys at law

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1	WHEREAS counsel for AAA and Najafpir believe that further negotiation		
2	will result in a fully executed settlement agreement within the coming two weeks;		
WHEREAS a Case Management Conference is set for June 9, 2008 at			
4 p.m. before this Honorable Court.			
5	FOLLOWS:		
1. The Case Management Conference currently set for June 9, 2008			
7	7 3:00 p.m. may be continued approximately thirty (30) days to July 14, 2008 at 3:0		
8	8 p.m., or to such other date and time as the Court may choose.		
9			
10	Dated: May 30, 2008	RUTAN & TUCKER, LLP MICHAEL T. HORNAK	
11		MICHAEL D. ADAMS	
12		By: LLD	
13		Michael D. Adams	
14		Attorneys for Plaintiff AMERICAN AUTOMOBILE ASSOCIATION, INC.	
15		ASSOCIATION, INC.	
16	Dated: May 30, 2008	RANDICK O'DEA & TOOLIATOS, LLP	
17			
18		By: Keven Martin by Michael Alam	
19		By: Keven Martin by Michael Ablam, Kevin R. Martin Attorneys for Defendant	
20		Attorneys for Defendant MOHAMMAD NAJAFPIR	
21			
ORDER ORDER		DER	
23	IT IS HEREBY ORDERED that Case Management Conference currently set for June 9, 2008 at 3:00 p.m. is continued to July 14, 2008 at 3:00 p.m.		
24			
25			
26			
27	Dated:	Judge, United States District Court	
28			
Rulan & Tucker LLP attorneys at law	2314/017601-0027 928109.01 a05/30/08	STIPULATION AND PROPOSED ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE	